

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals Service)
Standard Changes)

Docket No. N2021-1

**FIRST SET OF INTERROGATORIES TO USPS WITNESS Cintron, USPS-T1
(May 19, 2021)**

Pursuant to 39 C.F.R. § 3020.117, National Newspaper Association submits the following interrogatories and requests for documents and responses to USPS Witness Cintron. NNA requests that if any of its questions should be directed to another witness in this case, USPS will refer such questions to an appropriate witness.

Respectfully submitted,

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May 19, 2021

NNA/USPS T1-1

Please refer to the On-Time Performance chart in your testimony on p.8.

- a. Please confirm that the primary data collection mechanism for deriving service performance statistics come from scans within the Informed Visibility system of mailpieces, bundles and containers with Intelligent Mail barcodes? If not, please explain other sources that would be used to compile these results.**
- b. Please confirm that mail with Full Service Intelligent Mail barcodes is referred to by USPS as mail “in measurement” and that mail without such barcodes is considered not “in measurement.” If you do not confirm, please explain your response.**
- c. What percentage of Periodicals mail volume was considered “in measurement” in FY 2020?**
- d. Does the Postal Service compile data on the percentage of newspaper mail within the Periodicals class that is “in measurement?” If yes, please provide the percentage of newspaper mail “in measurement.” If not, please explain why the Postal Service does not compile such data.**
- e. Relying on your personal expertise in the development of the USPS Informed Visibility system, do you believe the presence of newspaper mail in measurement has been relatively low compared to other types of mail? Please explain your response.**
- f. If you confirm that newspaper mail in measurement has been relatively low compared to other types of mail, would you agree that the chart on p. 8 does not fully represent the actual service performance for newspaper delivery? Please explain your response.**

USPS T1-2

Does the Postal Service produce reports of the percentage of newspaper bundles that receive scans within the Informed Visibility System? If so, please provide reports for the period since the existing service standards were adopted, i.e., from 2012 to date.

USPS T1-3

Does the Postal Service produce reports of the percentage of newspaper containers that receive scans within the Informed Visibility System? If so, please provide reports for the period since the existing service standards were adopted, i.e., from 2012 to date.

NNA/USPS T1-4

With respect to the Informed Visibility system and data as they apply to newspaper mail,

- a. Do you believe the Informed Visibility system produces consistently reliable data on the on-time delivery of newspapers?**
- b. Do you agree that newspaper mail that is not sorted by automated sorting equipment would not receive barcode scans during mail processing, even if mailpieces contain Full Service Intelligent Mail Barcodes? If you disagree, please explain your response.**
- c. Would you generally agree that to the extent local newspapers are entered at Delivery Units for delivery within that unit's 5-digit ZIP code area, Informed Visibility data would capture only information on container and/or bundles if any data at all are captured?**
- d. Does the Postal Service produce reports on the percentage of DU-entered newspaper bundles and containers scanned into Informed Visibility reports? If so, please provide any relevant reports for FY 2020.**

USPS T1-5

With respect to a local newspaper publisher's mail entered at a Delivery Unit or an SCF for delivery outside the publisher's market area that would enter the end-to-end mailstream, do you agree

- a. That few of the mailpieces that enter the end-to-end mailstream receive IMb scans in mail processing?**
- b. That few of the mailpieces that enter the end-to-end mailstream receive IMb scans at delivery?**
- c. That in general, USPS relies upon scan data collected from magazine mailpieces, bundles and containers to compile statistics on service performance for Periodicals mail?**

USPS T1-6

Please explain your footnote 8 on p 11. Why does the Postal Service set service targets that are below the service standards?

USPS T1-7

With respect to the use of air transportation to carry First-Class or Periodicals mail:

- a. Does the Postal Service routinely use air transportation to carry Periodicals?**
- b. To the best of your knowledge, does the Postal Service routinely use air transportation to carry newspapers within the Periodicals class? Please explain your response.**
- c. If your response to subparts a) and b) was that air transportation is rarely or never used for Periodicals mail, please explain why changes in First-Class mail service standards involving air transportation necessitates also changing service standards for Periodicals?**

NNA/USPS T1-8

With respect to locally-entered (DU or SCF) newspaper mail,

- a. Please confirm that newspapers entered at a Delivery Unit before the unit's CET for next day delivery will be unaffected by the proposed service standards change.**
- b. Please confirm that newspapers dropped overnight at a Delivery Unit with an existing understanding that same-day delivery will be available will be unaffected by the proposed service standards change.**
- c. Please confirm that the use of exceptional dispatch under DMM 707.28.3 by newspapers to achieve same-day or next day delivery, where available now, will be unaffected by the proposed service standards change.**